



Order Filed on November 6,
2017 by Clerk, U.S. Bankruptcy
Court - District of New Jersey

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
FORMAN HOLT 66 Route 17 North, First Floor Paramus, NJ 07652 Telephone: (201) 845-1000 Facsimile: (201) 665-6650 Attorneys for Charles M. Forman, Chapter 7 Trustee Kim R. Lynch (KL-5866) klynch@formanlaw.com	
In Re:	Chapter 7
WRS HOLDINGS, LLC; <u>et al</u> ¹ ,	Case No. 10-28457 (SLM) Jointly Administered
Debtors.	Hearing Date: October 31, 2017 Hearing Time: 10:00 a.m

**CONSENT ORDER RECLASSIFYING AND MODIFYING CLAIM NO. 194-1 FILED BY
AIG PROPERTY CASUALTY COMPANY, AIG SPECIALTY INSURANCE
COMPANY, AMERICAN HOME ASSURANCE COMPANY, COMMERCE AND
INDUSTRY INSURANCE COMPANY, THE INSURANCE COMPANY OF THE
STATE OF PENNSYLVANIA, NATIONAL UNION FIRE INSURANCE COMPANY OF
PITTSBURGH, PA AND CERTAIN OTHER SUBSIDIARIES OF AIG PROPERTY
CASUALTY, INC. IN THE CASE OF WRS HOLDINGS, LLC**

The relief set forth on the following page, numbered two (2) through three (3) is hereby
ORDERED.
DATED: November 6, 2017

Honorable Stacey L. Meisel
United States Bankruptcy Judge

¹ The Debtors in these jointly administered chapter 7 cases are WRS Holdings, LLC, Case No. 10-28457 (DHS); WRS, LLC, Case No. 10-28461 (DHS); Woods Restoration Services, LLC, Case No. 10-28465 (DHS); Woods Restoration Services of South Carolina, LLC, Case No. 10-28471; Woods Restoration Services of Montclair, New Jersey, LLC, Case No. 10-28474 (DHS); Environmental Remediation Concepts, LLC, Case No. 10-28476 (DHS); and WRS, Inc., Case No. 10-28478 (DHS).

Page (2)

Debtor: WRS HOLDINGS, LLC; et al¹

Case No. 10-28457 (SLM)

Caption: Consent Order Reclassifying and Modifying Claim No. 194-1 filed by AIG Property Casualty Company, AIG Specialty Insurance Company, American Home Assurance Company, Commerce and Industry Insurance Company, the Insurance Company of the State of Pennsylvania, National Union Fire Insurance Company of Pittsburgh, PA and certain other subsidiaries of AIG Property Casualty, Inc. in the case of WRS Holdings, LLC

THIS MATTER having been brought before this Court upon the motion (the “Motion”) of Charles M. Forman, chapter 7 trustee of WRS Holdings, LLC, WRS, LLC, Woods Restoration Services, LLC, Woods Restoration Services of South Carolina, LLC, Woods Restoration Services of Montclair, New Jersey, LLC, Environmental Remediation Concepts, LLC, and WRS, Inc., (collectively, the “Debtors”), through his attorneys, Forman Holt, for the entry of an Order pursuant to 11 U.S.C. §502(a) and Rule 3007 of the Federal Rules of Bankruptcy Procedure for an Order Disallowing Claim No. 194-1 filed by AIG Property Casualty Company, AIG Specialty Insurance Company, American Home Assurance Company, Commerce and Industry Insurance Company, the Insurance Company of the State of Pennsylvania, National Union Fire Insurance Company of Pittsburgh, PA and certain other subsidiaries of AIG Property Casualty, Inc. (“Claimants”) in the case of WRS Holdings, LLC; and Claimants having informally objected to the relief sought by the Trustee; and the parties having agreed to the relief set forth herein; and the parties having agreed to the form and entry of this Consent Order; and for good cause shown; it is hereby

Page (3)

Debtor: WRS HOLDINGS, LLC; et al¹

Case No. 10-28457 (SLM)

Caption: Consent Order Reclassifying and Modifying Claim No. 194-1 filed by AIG Property Casualty Company, AIG Specialty Insurance Company, American Home Assurance Company, Commerce and Industry Insurance Company, the Insurance Company of the State of Pennsylvania, National Union Fire Insurance Company of Pittsburgh, PA and certain other subsidiaries of AIG Property Casualty, Inc. in the case of WRS Holdings, LLC

ORDERED that Claim No. 194-1 filed by Claimants in the case of WRS Holdings, LLC is hereby allowed as a general unsecured claim pursuant to 11 U.S. C. §726(a)(2) in the amount of \$278,869.75.

The undersigned are authorized and consent to the form and entry of this Order

FORMAN HOLT
Attorneys for Charles M. Forman,
Chapter 7 Trustee

By: /s/ Kim R. Lynch
Kim R. Lynch

By: /s/ Kevin J. Larner
Kevin J. Larner
Associate General Counsel
AIG Property Casualty, Inc.

Attorney for Claimants

Imaged Certificate of Notice Page 4 of 5

United States Bankruptcy Court
District of New JerseyIn re:
WRS Holdings, LLC
DebtorCase No. 10-28457-SLM
Chapter 7**CERTIFICATE OF NOTICE**

District/off: 0312-2

User: admin
Form ID: pdf903Page 1 of 2
Total Noticed: 1

Date Rcvd: Nov 06, 2017

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on
Nov 08, 2017.

db +WRS Holdings, LLC, c/o WRS, LLC, 22 Riverview Drive, Suite 101, Wayne, NJ 07470-3115

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
NONE. TOTAL: 0

***** BYPASSED RECIPIENTS *****

NONE.

TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Nov 08, 2017

Signature: /s/Joseph Speetjens**CM/ECF NOTICE OF ELECTRONIC FILING**The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email)
system on November 6, 2017 at the address(es) listed below:Adam D. Greenberg on behalf of Creditor Raynor Electric, Inc. agreenberg@hgllclaw.com,
Aholmes@hgllclaw.com

Alexander G. Benisatto on behalf of Creditor MFC CAPITAL FUNDING, INC.

abenisatto@shapiro-croland.com

Alexander G. Benisatto on behalf of Plaintiff MFC CAPITAL FUNDING, INC.

abenisatto@shapiro-croland.com

Ari J. Schwartz on behalf of Creditor JPMorgan Chase Bank, N.A. jteitelbaum@tblawllp.com

Brian E. Caine on behalf of Creditor Sunrise Lakes bcaine@parkermccay.com,

BKcourtnotices@parkermccay.com

Charles Forman on behalf of Interested Party A. Atkins Appraisal Company

cforman@formanlaw.com

Charles M. Forman on behalf of Trustee Charles M. Forman cforman@formanlaw.com,

lcapasso@formanlaw.com;cforman@iq7technology.com

Charles M. Forman cforman@formanlaw.com, lcapasso@formanlaw.com;cforman@iq7technology.com

Dale E. Barney on behalf of Interested Party Bradley Sheftel dbarney@gibbonslaw.com

Dale E. Barney on behalf of Defendant Antonio Gracias dbarney@gibbonslaw.com

Dale E. Barney on behalf of Defendant Bradley Sheftel dbarney@gibbonslaw.com

Dale E. Barney on behalf of Defendant Valor Management Corp. dbarney@gibbonslaw.com

Dale E. Barney on behalf of Interested Party Nelson Sun dbarney@gibbonslaw.com

Dale E. Barney on behalf of Defendant Valor Equity Partners dbarney@gibbonslaw.com

Dale E. Barney on behalf of Defendant VWR Holdings, LLC dbarney@gibbonslaw.com

Dale E. Barney on behalf of Interested Party Chester R. Dunican dbarney@gibbonslaw.com

Dale E. Barney on behalf of Interested Party Jonathan Shulkin dbarney@gibbonslaw.com

Dale E. Barney on behalf of Interested Party Robert Wasielewski dbarney@gibbonslaw.com

Dale E. Barney on behalf of Interested Party Antonio Gracias dbarney@gibbonslaw.com

Dale E. Barney on behalf of Defendant Jonathan Shulkin dbarney@gibbonslaw.com

David R. Lyons on behalf of Creditor Ally Financial Inc f/k/a GMAC Inc davidl@ldvlaw.com

Gregory W. Hauswirth on behalf of Defendant Contract Hardware & Supply Inc.

ghauswirth@leechtishman.com,

pcarothers@leechtishman.com;bankruptcy@leechtishman.com;dtomko@leechtishman.com

Heather Lynn Anderson on behalf of Defendant State of New Jersey

heather.anderson@law.dol.lps.state.nj.us

Jaimie A. Slosberg on behalf of Defendant Morris Holdings, LLC jslosberg@ravinggreenberg.com

Jaimie A. Slosberg on behalf of Defendant Hicks Capital Management, LLC

jslosberg@ravinggreenberg.com

John P. O'Toole on behalf of Defendant Robert Wasielewski John.OToole@wilsonelser.com

John R. Morton, Jr. on behalf of Creditor JPMorgan Chase Bank, N.A. ecfmail@mortoncraig.com,

mortoncraigecf@gmail.com

John R. Morton, Jr. on behalf of Creditor Ford Motor Credit Company, LLC

ecfmail@mortoncraig.com, mortoncraigecf@gmail.com

John V. Fiorella on behalf of Creditor New Jersey School Boards Association Insurance Group

jfiorella@archerlaw.com

District/off: 0312-2

User: admin
Form ID: pdf903

Page 2 of 2
Total Noticed: 1

Date Rcvd: Nov 06, 2017

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system (continued)

Joseph Michael Cerra on behalf of Trustee Charles M. Forman joseph.cerra@leclairryan.com
Joshua I. Goldman on behalf of Creditor Amtrust-NP SFR Venture, LLC jgoldman@kmlawgroup.com,
bkggroup@kmlawgroup.com
Judah D. Greenblatt on behalf of Creditor Bernard and Simha Margalit
jgreenblatt@greenblattlesser.com
Kate R. Buck on behalf of Defendant Cellco Partnership d/b/a Verizon Wireless
kbuck@mccarter.com
Kim R. Lynch on behalf of Plaintiff Charles M Forman klynch@formanlaw.com, kanema@formanlaw.com
Kim R. Lynch on behalf of Trustee Charles M. Forman klynch@formanlaw.com, kanema@formanlaw.com
Kim R. Lynch on behalf of Plaintiff Charles M. Forman klynch@formanlaw.com,
kanema@formanlaw.com
Leonard C. Walczyk on behalf of Creditor Post & Kelly Electric Company, Inc.
lwalczyk@wjslaw.com, lwalczyk@ecf.inforuptcy.com;dmendez@ecf.inforuptcy.com
Louis T. DeLucia on behalf of Transferee Ambrose Pine, Inc. ldelucia@schiffhardin.com
Louis T. DeLucia on behalf of Creditor MFC CAPITAL FUNDING, INC. ldelucia@schiffhardin.com
Martha R. Hildebrandt on behalf of U.S. Trustee United States Trustee
martha.hildebrandt@usdoj.gov
Matteo Percontino on behalf of Trustee Charles M. Forman matteo.percontino@leclairryan.com,
anna.sullivan@leclairryan.com
Matteo Percontino on behalf of Plaintiff Charles M. Forman matteo.percontino@leclairryan.com,
anna.sullivan@leclairryan.com
Matteo Percontino on behalf of Plaintiff Charles M Forman matteo.percontino@leclairryan.com,
anna.sullivan@leclairryan.com
Michael E. Holt on behalf of Attorney Forman Holt Eliades & Ravin LLC mholt@formanlaw.com,
kanema@formanlaw.com
Michael E. Holt on behalf of Trustee Charles M. Forman mholt@formanlaw.com,
kanema@formanlaw.com
Michael J. Greenberg on behalf of Cross Defendant Anthony Racciatti
mgreenberg@mgreenberglaw.com
Michael J. Greenberg on behalf of Cross-Claimant Anthony Racciatti mgreenberg@mgreenberglaw.com
Morris S. Bauer on behalf of Creditor Committee OPS Corp. msbauer@nmmlaw.com,
mmarks@nmmlaw.com,relkens@nmmlaw.com,
Morris S. Bauer on behalf of Creditor Committee Precise Management, LLC msbauer@nmmlaw.com,
mmarks@nmmlaw.com,relkens@nmmlaw.com,
Morris S. Bauer on behalf of Creditor Committee Division 9 Design & Construction LP
msbauer@nmmlaw.com, mmarks@nmmlaw.com,relkens@nmmlaw.com,
Morris S. Bauer on behalf of Creditor Committee Official Committee Of Unsecured Creditor
msbauer@nmmlaw.com, mmarks@nmmlaw.com,relkens@nmmlaw.com,
Morris S. Bauer on behalf of Creditor Committee Professional Painting, LLC msbauer@nmmlaw.com,
mmarks@nmmlaw.com,relkens@nmmlaw.com,
Morris S. Bauer on behalf of Creditor Committee Official Comittee of Unsecured Creditors
msbauer@nmmlaw.com, mmarks@nmmlaw.com,relkens@nmmlaw.com,
Morris S. Bauer on behalf of Creditor Committee Truly New Cleaning Corp. msbauer@nmmlaw.com,
mmarks@nmmlaw.com,relkens@nmmlaw.com,
Morris S. Bauer on behalf of Creditor Committee Official Committee Of Unsecured Creditors
msbauer@nmmlaw.com, mmarks@nmmlaw.com,relkens@nmmlaw.com,
Ron Reich on behalf of Creditor Advanced Furnace & Air Duct Cleaning, Inc.
rreich@simonattorneys.com, ronreichesq@gmail.com
Sam Della Fera on behalf of Debtor Environmental Remediation Concepts, LLC
sdellafera@trenklawfirm.com
Sam Della Fera on behalf of Debtor Woods Restoration Services of S.C., LLC
sdellafera@trenklawfirm.com
Sam Della Fera on behalf of Debtor WRS, LLC sdellafera@trenklawfirm.com
Sam Della Fera on behalf of Debtor Woods Restoration Services of Montclair, NJ, LLC
sdellafera@trenklawfirm.com
Sam Della Fera on behalf of Debtor WRS, Inc sdellafera@trenklawfirm.com
Sam Della Fera on behalf of Debtor Woods Restoration Services sdellafera@trenklawfirm.com
Sam Della Fera on behalf of Debtor WRS Holdings, LLC sdellafera@trenklawfirm.com
Shoshana Schiff on behalf of Debtor Woods Restoration Services of Montclair, NJ, LLC
sschiff@trenklawfirm.com, cdeangelis@trenklawfirm.com
Shoshana Schiff on behalf of Debtor WRS Holdings, LLC sschiff@trenklawfirm.com,
cdeangelis@trenklawfirm.com
Shoshana Schiff on behalf of Debtor Woods Restoration Services of S.C., LLC
sschiff@trenklawfirm.com, cdeangelis@trenklawfirm.com
Shoshana Schiff on behalf of Debtor Environmental Remediation Concepts, LLC
sschiff@trenklawfirm.com, cdeangelis@trenklawfirm.com
Shoshana Schiff on behalf of Debtor WRS, LLC sschiff@trenklawfirm.com,
cdeangelis@trenklawfirm.com
Shoshana Schiff on behalf of Debtor WRS, Inc sschiff@trenklawfirm.com,
cdeangelis@trenklawfirm.com
Shoshana Schiff on behalf of Debtor Woods Restoration Services sschiff@trenklawfirm.com,
cdeangelis@trenklawfirm.com
United States Trustee USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 71